

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**PLAINTIFFS' NOTICE OF FILING EXPERT STATEMENTS IN  
SUPPORT OF UNSEALING THE REDACTED HALDERMAN REPORT  
(DKT. 1639)**

Plaintiffs jointly file the following expert statements that were submitted to the Court on May 16, 2023, in response to the Court's May 5, 2023 request relating to Plaintiffs' position regarding unsealing the July 2021 Expert Report prepared by Dr. Alex Halderman (with support from Dr. Drew Springall):

- May 11, 2023 Statement by Computer Security Experts, "Unsealing the Halderman report would be Responsible Vulnerability Disclosure;"
- May 12, 2023 Declaration of Dr. Andrew A. Appel;
- May 15, 2023 Statement of Gregory A. Miller, OSET Institute, Inc.;
- May 15, 2023 Declaration of Kevin Skoglund;
- May 15, 2023 Declaration of Dr. Richard DeMillo;
- May 15, 2023 Declaration of Dr. Duncan A. Buell; and
- May 16, 2023 Declaration of Dr. J. Alex Halderman.

Respectfully submitted this 5th day of June, 2023.

/s/ David D. Cross

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**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

*/s/ David D. Cross*  
David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2023, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

*/s/ David D. Cross*  
David D. Cross